

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF MARYLAND  
3                   (Northern Division)  
4  
5       MELVIN NEWSOME, et al.,                   )  
6    Plaintiffs, )  
7                   vs.   ) Civil Action  
8       UP-TO-DATE LAUNDRY, INC., et al., ) No. S01-2257  
9   Defendants. )

10   —       —       —       —       —

11  
12                   DEPOSITION OF BRAD MINETREE  
13   Baltimore, Maryland  
14   Thursday, February 13, 2003  
15

16       The videotaped deposition of BRAD MINETREE was  
17       convened on Thursday, February 13, 2003,  
18       commencing at 10:08 a.m., at the offices of  
19       Whiteford, Taylor & Preston, 7 St. Paul Street,  
20       Suite 1300, Baltimore, Maryland, before Sal  
21       Napolitano, Notary Public in and for the State of  
22       Maryland.

1 Q. Have you heard him use it in any other  
2 sense or --

3 A. Only time I heard him say anything is  
4 toward me directly.

5 Q. Now, do you ever use the term nigger at  
6 the workplace, Up-To-Date Laundry?

7 A. What do you mean use the word nigger at  
8 the workplace?

9 Q. Okay. You're the president of Up-To-Date  
10 Laundry, right?

11 A. Yes, I am.

12 Q. Okay. How long have you been president  
13 of Up-To-Date Laundry?

14 A. Since 1993-94.

15 Q. And you've worked there continuously  
16 since the 1993-94 time frame, right?

17 A. Yes.

18 Q. Okay. During that time frame have you  
19 used the word nigger at the Up-To-Date Laundry  
20 plant?

21 A. Yes.

22 Q. And have you used that word in front of

1 black employees?

2 A. Describe in front.

3 Q. In their hearing. Within their hearing,  
4 sir.

5 A. It's possible.

6 Q. Have you ever used -- do you know the  
7 word coon, have you ever heard that word?

8 A. I've heard it in my lifetime, yes.

9 Q. And do you ever use the word coon?

10 A. No.

11 Q. Ever heard the word Kunte Kinte?

12 A. Only time I heard that was that movie.

13 Q. What does Kunte Kinte mean to you?

14 A. It was the name of the gentleman in the  
15 movie.

16 Q. You ever refer to any employee at  
17 Up-To-Date Laundry at Kunte Kinte?

18 A. No.

19 Q. You ever called Joseph Lloyd Kunte Kinte?

20 A. No.

21 Q. Can you give me -- you gave one example  
22 of using the word nigger-rig-it. Can you give me

1 any other example of how you would use the word  
2 nigger during your speech?

3 A. Not off the top of my head.

4 Q. Do you think -- strike that.

5 I'm not familiar with this term  
6 nigger-rig-it and is it fair to say that  
7 nigger-rig-it is defined as not correctly fixing  
8 something but instead using old or other used  
9 parts to fix something?

10 A. Yeah.

11 Q. Well, if you think of any other way in  
12 which you use the word nigger during your -- at  
13 Up-To-Date Laundry or just as a matter of speech  
14 during the course of this deposition, you can let  
15 me know, okay?

16 A. Okay.

17 Q. Is it fair to say you've only thought of  
18 one way you use it right now and that's  
19 nigger-rig-it?

20 A. It's not a thing that I say a lot.

21 Q. Well, I'm asking when you use it --

22 A. What's --

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF MARYLAND  
3                   (NORTHERN DIVISION)  
4  
5    MELVIN NEWSOME, et al.,                   )  
6                                   Plaintiffs,               ) Civil Action  
7                   vs.                                        ) No. S01-2257  
8    UP-TO-DATE LAUNDRY, INC., et al.,       )  
9                                   Defendants.               )

10

11   Wednesday, May 21, 2003  
12   Towson, Maryland

13

14                   DEPOSITION OF BRAD MINETREE (VOLUME II)

15

16                   The videotaped deposition of BRAD MINETREE  
17    was resumed on Wednesday, May 21, 2003, at 10:15  
18    a.m., taken at 15 East Chesapeake Avenue, Towson,  
19    Maryland, before Raymond G. Brynteson, RDR-CRR and  
20    Notary Public.

21

22

1 was.

2 Q. Did it have anything to do with race and  
3 race characteristics at the company?

4 A. I can't sit here and say exactly what that  
5 report was. My main concentration was customers  
6 and production.

7 Q. Did you ever hear Dave Minetree use the  
8 word nigger at the workplace?

9 A. In the office.

10 Q. You did hear him use it in the office?

11 A. Yes.

12 Q. Is that appropriate, sir?

13 A. He said it to me, and no.

14 Q. Was he ever disciplined for using the word  
15 nigger in the workplace?

16 A. I could not discipline David.

17 Q. Did you ever propose that David Minetree  
18 be disciplined for using the word nigger in the  
19 workplace?

20 A. Well, yes.

21 Q. Is that in writing?

22 A. No.